

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF GEORGIA
COLUMBUS DIVISION**

SHERRELL DOWDELL-)
MCELHANEY,)
)
Plaintiff,)
)
)
v.) CIVIL ACTION NO.
) 4:20-CV-00289-CDL
GLOBAL PAYMENTS INC. AND)
TOTAL SYSTEM SERVICES, LLC)
)
Defendants.)
)

DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

Defendants Global Payments Inc. and Total System Services, LLC (hereinafter, “TSYS”) move for summary judgment on Plaintiff Sherrell Dowdell-McElhaney’s (hereinafter, “Plaintiff”) claims. As set out more fully in the Memorandum of Law in Support of this Motion, the Court should grant summary judgment to Defendants because there is no genuine issue as to material facts, and Defendants are entitled to judgment as a matter of law. This Motion is based upon:

1. All pleadings and other papers previously filed in this action;
2. All exhibits attached to this Motion;
3. Defendants’ Statement of Undisputed Material Facts as to Which There is No Genuine Issue to be Tried, and any exhibits attached thereto;
4. Memorandum of Law in Support of Defendants’ Motion for Summary Judgment;
5. The May 24, 2022 deposition transcript of Plaintiff Sherrell Dowdell-

McElhaney, and any exhibits attached thereto;

6. The Declaration of Leslie Luck;
7. The Declaration of Marco Grimes;
8. The Declaration of Loretta Owen, and any exhibits attached thereto;
9. The Declaration of Kenny Anderson;
10. The Declaration of Christopher Yarbrough, and any exhibits attached thereto;

and

11. The Declaration of Tim Sanders.

WHEREFORE, based on the foregoing record evidence, Defendants pray that the Court enter an order granting their Motion for Summary Judgment, dismissing Plaintiff's claims in their entirety with prejudice, and awarding Defendants their costs, including reasonable attorney's fees, and such other relief as may be just and appropriate.

Respectfully submitted, this 29th day of August, 2022,

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CERTIFICATE OF SERVICE

I hereby certify that on August 29, 2022, I served a true and correct copy of **DEFENDANTS' MOTION FOR SUMMARY JUDGMENT** by filing the same with the Clerk of Court using CM/ECF system, which will automatically send e-mail notification of such filing to the following counsel of record:

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s/ Patrick L. Lail
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